	Case 3:18-cv-00461-RCJ-CSD Do	ocument 162	Filed 02/11/22	Page 1 of 8
1 2 3 4	Katherine F. Parks, Esq State Bar N Thorndal Armstrong Delk Balkenbush 6590 S. McCarran Blvd., Suite B Reno, Nevada 89509 (775) 786-2882 kfp@thorndal.com Attorneys for Defendants			
5 6	CHURCHILL COUNTY AND BENJAMIN TROTTER			
7	UNITED STATES DISTRICT COURT			
8	DISTRICT OF NEVADA			
9	MICHAEL ERWINE,	ı	G + GE > 10 - 10 - 10	00464 70 04 007
10		Dlaintiff	CASE NO. 3:18-	cv-00461-RCJ-CSD
11		Plaintiff,	DEFENDANTS'	
12	vs.		VERDICT FOR	<u>MS</u>
13 14	CHURCHILL COUNTY, a political of the State of Nevada; CHURCHIL SHERIFF BENJAMIN TROTTER;	L COUNTY		
15	through 10 inclusive,			
16		Defendants.		
17	governower and a governor			A MANAGE CONTRACT
18	COME NOW Defendants, CHURCHILL COUNTY and BENJAMIN TROTTER, by an			
19	through their attorneys of record, Thorndal Armstrong Delk Balkenbush & Eisinger, and hereby			
20	submit their proposed verdict forms (subject to revision depending upon presentation of evidence			
21 22	at trial) as follows:			
23				
24				
25				
26				
27				
28				
- 1				

	Case 3:18-cv-00461-RCJ-CSD Document 16	52 Filed 02/11/22 Page 2 of 8		
1 2				
3				
4				
5				
6				
7				
8	UNITED STATES D	ISTRICT COURT		
9	DISTRICT OF NEVADA			
10	MICHAEL ERWINE,	CASE NO. 3:18-cv-00461-RCJ-CSD		
11	Plaintiff,			
12	VS.	<u>VERDICT FOR DEFENDANTS ON</u> <u>PLAINTIFF'S 42 U.S.C. §1983 CLAIM</u>		
14	CHURCHILL COUNTY, a political subdivision	n		
15	of the State of Nevada; CHURCHILL COUNT'SHERIFF BENJAMIN TROTTER; and DOES	Y		
16	through 10 inclusive,			
17	Defendants.			
18				
19	On Plaintiff's claim brought under 42 U.S.C. §1983 against the Defendants for the			
20	alleged deprivation of a liberty interest without adequate process under the Fourteenth			
21	Amendment of the United States Constitution and Article 1, §8(5) of the Nevada Constitution,			
22 23	we the jury find in favor of the Defendants and against Plaintiff.			
24	DATED:, 2022.			
25				
26				
27	FOR	EPERSON		
28				

	Case 3:18-cv-00461-RCJ-CSD	Document 162	Filed 02/11/22	Page 3 of 8	
1					
2					
4					
5					
6					
7					
8					
9	UNITED STATES DISTRICT COURT				
10		DISTRICT OF N	IEVADA		
11	MICHAEL ERWINE,		CASE NO. 3:18-	-cv-00461-RCJ-CSD	
12		Plaintiff,	VERDICT FOR	DEFENDANTS ON	
13	vs.			DEFAMATION CLAIM	
14	CHURCHILL COUNTY, a politic	cal subdivision			
16	of the State of Nevada; CHURCH SHERIFF BENJAMIN TROTTER				
17	through 10 inclusive,				
18		Defendants.			
19	On Plaintiff's slaim assingt t	sha Dafandanta fa	u defendation we	the iver find in face of	
20	On Plaintiff's claim against the Defendants for defamation, we the jury find in favor of				
21	the Defendants and against Plaintiff				
22	Dated:, 2	022.			
23					
24		EODED	EDSON		
2526		FOREP	EKSUN		
27					
28					

	Case 3:18-cv-00461-RCJ-CSD Docume	nt 162	Filed 02/11/22	Page 4 of 8
1				
2				
3				
4				
5				
6				
7				
8	UNITED STATI	ES DIS	TRICT COURT	
10	DISTRICT OF NEVADA			
11	MICHAEL ERWINE,	ı	 	
12		c	CASE NO. 3:18-	-cv-00461-RCJ-CSD
13	Plaintif	r,		DEFENDANTS ON
14	VS.		PLAINTIFF'S T	<u>CORTIOUS</u> VE DISCHARGE
15	CHURCHILL COUNTY, a political subdiv of the State of Nevada; CHURCHILL COU	ision	CLAIM	<u></u> -
16	SHERIFF BENJAMIN TROTTER; and DO			
17	through 10 inclusive,			
18	Defenda	nts.		
19				
20	On Plaintiff's claim against the Defendants for tortious constructive discharge, we the			
21	jury find in favor of the Defendants and against Plaintiff.			
22	Dated:, 2022.			
23				
24				
25	j	FOREP	ERSON	
26				
27				
28				

	Case 3:18-cv-00461-RCJ-CSD	Document 162	Filed 02/11/22	Page 5 of 8
1				
1 2	П			
3				
4				
5				
6				
7				
8	UNITI	ED STATES DIS	TRICT COURT	
9	DISTRICT OF NEVADA			
10	MICHAEL ERWINE,		CASE NO 3:18.	-cv-00461-RCJ-CSD
11		Plaintiff,	C/102 110. 3.10	ev outor-Respectible
12	vs.		VERDICT FOR PLAINTIFF'S I	<u>DEFENDANTS ON</u> NTENTIONAL
13		tical subdivision	INTERFERENCE PROSPECTIVE	CE WITH
15	of the State of Nevada; CHURC	HILL COUNTY	ADVANTAGE (
16	SHERIFF BENJAMIN TROTTI through 10 inclusive,	ER; and DOES I		
17		Defendants.		
18				
19	On Plaintiff's claim against the Defendants for intentional interference with prospective			
20	economic advantage, we the jury find in favor of the Defendants and against Plaintiff.			
21	Dated:,	2022.		
22				
23				
24	FOREPERSON			
2526				
27				
28				

	Case 3:18-cv-00461-RCJ-CSD Docume	ent 162	Filed 02/11/22	Page 6 of 8	
1					
2					
3					
4					
5					
6					
7	UNITED STAT	ES DIST	TRICT COURT		
8	DISTRICT OF NEVADA				
9					
10	MICHAEL ERWINE,		CASE NO. 3:18-	ev-00461-RCJ-CSD	
11	Plainti	iff,	VERDICT FOR	PLAINTIFF ON	
12	vs.		STATE TORT (
13	CHURCHILL COUNTY, a political subdi				
14 15	of the State of Nevada; CHURCHILL CO SHERIFF BENJAMIN TROTTER; and D through 10 inclusive,				
16	Defend	lants.			
17		<u>-</u>			
18	<u>Defamation Claim</u>				
19 20	Do you find in favor of Plaintiff and against Defendants on Plaintiff's defamation claim?				
21	YES: NO:				
22	Tortious Constructive Discharge C	<u>Claim</u>			
23	Do you find in favor of Plaintiff and	against I	Defendants on Plai	ntiff's tortious discharge	
24	claim?				
25	YES: NO:				
26		maadii T	Jaamania Ad4	9.50	
27	Intentional Interference with Prosp	pective E	<u>LCONOMIC AGVANT</u>	<u>age</u>	
28	YES: NO:			3	
				*	

Having found in favor of the Plaintiff and against Defendants on one or more of these claims, we the jury assess the total damages as follows: Dated: ______, 2022. **FOREPERSON** DATED this // day of February, 2022. THORNDAL ARMSTRONG DELK BALKENBUSH & EISINGER Katherine F./Parks, Esq. State Bar No. 6227 6590 S. McCarran Blvd., Suite B Reno, Nevada 89509 (775) 786-2882 kfp@thorndal.com Attorneys for Defendants Churchill County and Benjamin Trotter

Case 3:18-cv-00461-RCJ-CSD Document 162 Filed 02/11/22 Page 7 of 8

CERTIFICATE OF SERVICE 1 Pursuant to FRCP 5(b), I certify that I am an employee of THORNDAL ARMSTRONG DELK 2 3 BALKENBUSH & EISINGER, and that on this date I caused the foregoing **DEFEND ANTS**' 4 **PROPOSED VERDICT FORMS** to be served on all parties to this action by: 5 placing an original or true copy thereof in a sealed, postage prepaid, envelope in the 6 United States mail at Reno, Nevada. 7 8 ✓ United States District Court, District of Nevada CM/ ECF (Electronic Case Filing) 9 personal delivery 10 facsimile (fax) 11 Federal Express/UPS or other overnight delivery 12 fully addressed as follows: 13 14 Luke Busby, Esq. 316 California Ave., #82 15 Reno, NV 89509 16 Attorney for Plaintiff 17 day of February, 2022. DATED this In Bautise 18 19 An employee of THORNDAL ARMSTRONG DELK BALKENBUSH & EISINGER 20 21 22 23 24 25 26 27 28